

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT  
for the

Southern District of Florida

United States of America

v.

ERICK DILTS,

)  
)  
)  
)  
)

Case No. 24-mj-6381-PAB

FILED BY \_\_\_\_\_ D.C.

AUG 09 2024

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - FT. LAUD.

Defendant(s)

**CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 8, 2024 in the county of Broward in the  
Southern District of Florida, the defendant(s) violated:

*Code Section*

*Offense Description*

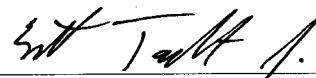
18 U.S.C. § 922(g)(1)

Possession of Ammunition by a Convicted Felon

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.



Complainant's signature

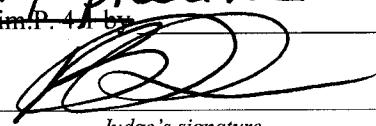
DEA Special Agent Ernest Tolbert

Printed name and title

*Sworn and subscribed to in my presence*

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by

Date: 8-9-2024



Judge's signature

City and state: Fort Lauderdale, Florida

Honorable Panayotta Augustin-Birch, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Ernest Tolbert, being first duly sworn, hereby depose and state as follows:

1. I am a sworn Special Agent with the Drug Enforcement Administration (DEA) and have been in that capacity since April 2023. The DEA is a federal law enforcement agency authorized to conduct investigations pertaining to criminal violations of the federal narcotics statutes, including Titles 18 and 21 of the United States Code. As a DEA Special Agent, I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I am empowered by law to conduct investigations of, and/or to make arrests for, offenses enumerated in Title 21, United States Code, Sections 841 and 846, among others. I have received specialized training on the subject matter of narcotics trafficking and money laundering from the DEA and have been personally involved in investigations concerning the possession, manufacture, and distribution of controlled substances, as well as methods used to finance drug transactions. I have received specialized training in narcotics investigations and identification as well as the laws pertaining to search and seizure.

2. I submit this affidavit based on information known to me personally from the investigation, as well as information obtained from others who have investigated the matter or have personal knowledge of the facts herein.

3. The information contained in this affidavit is submitted for the limited purpose of establishing probable cause to obtain a criminal complaint charging Erick DILTS (“DILTS”) with possession of ammunition by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1). Accordingly, this affidavit does not include every fact known to me or to other law enforcement officers surrounding the investigation.

**PROBABLE CAUSE**

4. On August 8, 2024, agents from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), along with agents from the Drug Enforcement Administration (DEA) and local law enforcement executed federal search warrants authorized by United States Magistrate Judge Panayotta Augustin-Birch.<sup>1</sup> The warrant authorized the search of 2401 Northeast 10th Street, Apt. #2, Pompano Beach, Florida 33062 (TARGET RESIDENCE). TARGET RESIDENCE is a two-bedroom apartment with one bathroom. Upon entry, agents observed Erick DILTS (DILTS) and Nicole Peloquin laying on a pull-out bed in the living room—they were the only two individuals in the TARGET RESIDENCE.

5. Based on your affiant's training and experience, one of the bedrooms was set up as a clandestine narcotics laboratory—there were several workstations in the room that contained multiple items associated with drug trafficking and manufacturing controlled substances. Some of the items found in the clandestine narcotics laboratory include:

- a. On one of the workstations, agents observed a pill press commonly used by drug traffickers to assist in their distribution of controlled substances, such as MDMA, in pill form. The pill press contained pink residue that is pending testing.
- b. On another workstation, a 3-D printer was located. Based on your affiant's training and experience, and through discussions with ATF agents, I know that firearms can be manufactured using additive manufacturing processes that utilize 3-D printers with associated software programs and materials such as either plastic filament (including acrylonitrile butadiene styrene or "ABS") or metal filament. I am aware that 3-D printers capable of producing firearms or firearm parts using ABS filament

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<sup>1</sup> 24-mj-6378-PAB and 24-mj-6379-PAB.

material are readily available on the consumer market and can be purchased for as little as \$200.00. With this type of equipment, a subject can manufacture firearms that perform as well as those created by licensed manufacturers. Additionally, because unlicensed individuals are not subject to the federal requirements applicable to licensed manufacturers (which include requirements for serial numbers and other markings), these individuals can manufacture firearms without any identifying markings, or can place on the firearms any type of markings they desire., 3-D printing technology may be used to manufacture firearms, machinegun conversion devices, etc. 3-D printing technology presents unique challenges to law enforcement, making unregistered or undocumented firearms.

- c. There was a shelving unit in the room that contained two shelves lined with jars that contained a black liquid substance, that is believed to be a controlled substance. For safety reasons, a field test was not conducted, but members of the clandestine laboratory team took samples of the controlled substances for further testing.
- d. The room also contained multiple labeled gallon-sized bottles containing precursors commonly used to manufacture controlled substances.

6. Additionally, while law enforcement officers conducted their search, they discovered four firearms, an extended magazine, additional rounds of ammunition, among other items.

- a. In the locked safe located in the clandestine laboratory, agents found one apparent Privately Made Firearm loaded with live rounds of ammunition. I know that Privately Made Firearms (PMFs), including privately made frames and receivers, are firearms that have been completed, assembled, or otherwise produced by a

person other than a licensed manufacturer. Privately Made Firearms are also made without a serial number placed by a licensed manufacturer at the time the firearm was produced.

- i. The safe also contained DILTS's passport, his driver's license, and a backup battery for an electronic monitor.<sup>2</sup>

7. Agents also discovered three additional apparent PMFs in the clandestine laboratory, in addition to an extended magazine loaded with 31 rounds of ammunition.

8. Approximately 202 rounds of ammunition of different calibers and manufacturers were in the TARGET RESIDENCE, primarily in the clandestine laboratory and in the kitchen. More specifically, agents seized the following:

a. Clandestine laboratory:

- i. 8 rounds of Roma 9 millimeter luger ammunition;
  - The ammunition was loaded into the firearm found in the locked safe, along with DILTS's passport and identification.
- ii. 51 rounds of Sellier & Bellot 9 millimeter ammunition;
- iii. 73 rounds of Winchester .22 caliber ammunition;
- iv. 50 rounds of Federal .45 caliber auto ammunition;

b. Kitchen:

- i. 20 rounds of Black Talon Winchester .45 caliber ammunition;

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<sup>2</sup> DILTS has a pending cocaine and MDMA trafficking charge pending in Broward County criminal case number 21-003252-CF10A, where he is currently on pretrial release and on an electronic GPS monitor.

9. ATF reviewed the rounds of ammunition found while executing the search warrant and confirmed that the ammunition was not manufactured in Florida, therefore the ammunition traveled in or affected interstate or foreign commerce.

10. A criminal records check revealed that DILTS is a convicted felon, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year. On or about May 17, 2024, DILTS was convicted of two counts of possession of cocaine with intent to sell, manufacture, and deliver in Miami-Dade County, Florida—both charges are punishable by a maximum term of 15 years' imprisonment.<sup>3</sup>

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<sup>3</sup> Criminal case number F22-18760.

**CONCLUSION**

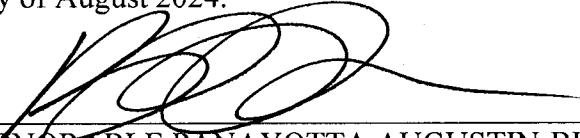
11. Based on the aforementioned information, I respectfully submit that there is probable cause to believe that Erick DILTS did commit the following offense: possession of ammunition by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1).

**FURTHER YOUR AFFIANT SAYETH NAUGHT.**

*Ernest Tolbert Jr.*  
ERNEST TOLBERT  
SPECIAL AGENT  
DRUG ENFORCEMENT ADMINISTRATION

**Sworn and subscribed to in my presence.**

Attested to by the applicant in accordance  
with the requirements of Fed. R. Crim. P.  
4.1 by \_\_\_\_\_ this 9th  
day of August 2024.

  
HONORABLE PANAYOTTA AUGUSTIN-BIRCH  
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NUMBER:** \_\_\_\_\_

**BOND RECOMMENDATION**

**DEFENDANT:** Erick Dilts \_\_\_\_\_

**Pre-Trial Detention**

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:



AUSA: Vanessa E. Bonhomme

Last Known Address: 2401 Northeast 10th Street, Apt. #2

Pompano Beach, Florida 33062

What Facility: \_\_\_\_\_

Agent(s): DEA SA Ernest Tolbert  
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (OTHER)